

GIBSON DUNN

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August 13, 2020

VIA ELECTRONIC FILING

The Honorable Lorna G. Schofield United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 This application is untimely but nevertheless GRANTED. The parties shall file their joint conference materials by **August 17**, **2020**, **5:00 PM ET**.

Dated: August 13, 2020 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al., No. 20-cv-3773 (LGS)

Dear Judge Schofield:

We write as Defendants' counsel on behalf of all parties in this action, pursuant to Paragraph I.B.2 of Your Honor's Individual Rules and Procedures, to respectfully request an extension of two business days—from August 13 to August 17, 2020—of the deadline for the parties to submit the joint letter and Proposed Civil Case Management Plan and Scheduling Order ("Proposed Scheduling Order") directed by the Court's June 8, 2020 Order, *see* Dkt. No. 17.¹

The parties have worked in good faith toward preparing the joint letter and developing a Proposed Scheduling Order, and believe an additional two business days will permit complete agreement on all points, and time for explanation to clients.

The parties of course remain available to attend the initial conference scheduled for August 20. Should the Court prefer, the parties will make themselves available at the Court's convenience on an alternative date.

This is the parties' first joint request for an extension in this case. (Once previously, Defendants have sought and received an extension. *See* Dkt. Nos. 23 and 24.)

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¹ The parties acknowledge the Court's requirements that these submissions be filed one week prior to the initial conference, and that any extension request be made 48 hours prior to the applicable deadline. Dkt. No. 17; Indiv. R. & P. ¶ IV.A.2. The parties nevertheless ask the Court's indulgence on this single occasion as they move toward completing the required joint letter and Proposed Scheduling Order, which as noted, the parties believe will be agreed on all points. The parties will be mindful in the future of the necessity of adhering to the Court's filing requirements, and regret any inconvenience to the Court.

GIBSON DUNN

The Honorable Lorna G. Schofield August 13, 2020 Page 2

As always, we thank the Court for its consideration.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All Counsel of Record (via ECF)